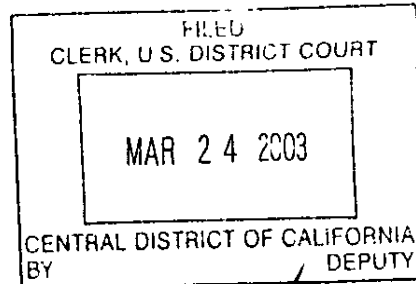


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GOLDSMITH & HULL, P.C. Our File No. 10201274  
 Scott M. Gitlen (BN 94596)  
 18425 Burbank Boulevard, Suite 615  
 Tarzana, CA 91356-2821  
 (818) 708-2585  
 FAX (818) 996-4537

Attorneys for Plaintiff  
 United States of America



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CLERK, U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

HI-TECH DESIGN KITCHEN AND  
 INTERIORS, a California corporation;  
 KAMBAKHSR REZAI aka KAMBAKHAH  
 REZAI; and MINOO NEJAD BAKHSR aka  
 M.N. BAKHSR aka MINOO NEJAD REZAI,

Defendant(s).

Case No. CV02-7168 GAF (Ex)

STIPULATION FOR ENTRY OF  
 CONSENT JUDGMENT

Plaintiff UNITED STATES OF AMERICA having filed its Complaint herein,  
 and defendants HI-TECH DESIGN KITCHEN AND INTERIORS, a California corporation;  
 KAMBAKHSR REZAI aka KAMBAKHAH REZAI; and MINOO NEJAD BAKHSR aka  
 M.N. BAKHSR aka MINOO NEJAD REZAI having consented to the making and entry of  
 this Judgment without trial, HEREBY AGREE AS FOLLOWS:

FURTHERMORE, Cross-complainants HI-TECH DESIGN KITCHEN AND  
 INTERIORS, a California corporation and KAMBAKHSR REZAI aka KAMBAKHAH  
 REZAI; and Cross-defendant MINOO NEJAD BAKHSR aka M.N. BAKHSR aka MINOO  
 NEJAD REZAI having consented to the making and entry of this Judgment without trial,  
 also HEREBY AGREE AS FOLLOWS:

MAR 24 2003

17

1           1.     This Court has jurisdiction over the subject matter of this litigation and over all  
2 parties thereto, pursuant to 28 U.S.C. §1345. The Complaint filed herein states a claim upon  
3 which relief can be granted.

4           2.     Each defendant hereby acknowledges, and accepts, service of the Complaint  
5 filed herein. Each defendant acknowledges and agrees that the facts and allegations made  
6 therein are true and correct. Cross-defendant MINOO NEJAD BAKHSH aka M.N.  
7 BAKHSH aka MINOO NEJAD REZAI hereby acknowledges, and accepts, service of the  
8 Cross-complaint filed herein. Cross-defendant acknowledges and agrees that the facts and  
9 allegations made therein are true and correct.

10          3.     Each defendant hereby agrees that plaintiff the UNITED STATES OF  
11 AMERICA have and recover from defendants HI-TECH DESIGN KITCHEN AND  
12 INTERIORS, a California corporation; KAMBAKSHH REZAI aka KAMBAKHAH  
13 REZAI; and MINOO NEJAD BAKHSH aka M.N. BAKHSH aka MINOO NEJAD REZAI,  
14 and each of them, \$58,804.49 principal, \$26,898.79 interest (to March 24, 2003 plus \$6.44  
15 *per diem* until date of entry of judgment by the Court), \$3,952.18 attorneys' fees, and  
16 \$251.00 costs, for a total of \$89,906.46 (plus additional *per diem* sums). Judgment to  
17 accrue interest at the legal rate until paid.

18          4.     Cross-defendant MINOO NEJAD REZAI hereby agrees that Judgment be  
19 entered in favor of Cross-complainants KAMBAKSHH REZAI and HI-TECH DESIGN  
20 KITCHEN AND INTERIORS, a California corporation, against Cross-defendant MINOO  
21 NEJAD REZAI in the amount of \$89,906.46.

22          5.     **Stipulated Post-Judgment Payment Plan.** Unless superseded by the terms  
23 of paragraph 5b, the obligation of each of the defendants may be considered satisfied upon  
24 completion of timely payments of the compromised amount of \$92,418.09 by defendants  
25 as follows:

- 26           a.     Fifty-nine (59) consecutive monthly payments of \$1,540.32 each, due on  
27 or before the 24th day of each month commencing March 24, 2003, with  
28 a sixtieth (60<sup>th</sup>) monthly payment due on or before February 24, 2008 in

the amount of \$1,539.21.

b. The aforestated payment schedule is to be in effect **unless until either of the following conditions fail to occur:**

(1) Plaintiff and Judgment Creditor United States of America may file its Abstracts of Judgment upon issuance of the Judgment so that in the event *any* real property transaction so encumbered is to take place, payment in full of the entirety of the then unpaid judgment shall be required notwithstanding the payment plan

**or**

(2) Each and all the Judgment Debtors shall have a continuing obligation to submit to Plaintiff and Judgment Creditor through its counsel on an annual basis no later than thirty days after the due date for filing, a signed copy of the federal tax return of that party plus an original signed and audited financial statement prepared by a Certified Public Accountant, renegotiation or payment in full of the entire unpaid judgment shall be required if in the sole discretion of the Judgment Creditor the financial condition of any judgment debtor leads the Judgment Creditor to determine that continuing the payment plan for another year would not be reasonable.

It should be noted that the payment plan is set at merely 1.09% interest on an amortization schedule which is the judgment interest rate in effect March 10, 2003.

**6. Stipulation Between Cross-complainants KAMBAKHSHEH REZAI, etc. and HI-TECH DESIGN KITCHEN AND INTERIOR, a California corporation and Cross-defendant MINOO NEJAD REZAI.** Cross-complainants KAMBAKHSHEH REZAI and HI-TECH DESIGN KITCHEN AND INTERIORS, a California corporation agree that payments timely tendered to the Plaintiff UNITED STATES OF AMERICA, by Cross-defendant MINOO NEJAD REZAI pursuant to paragraph 5, supra, on the judgment held by Plaintiff shall sequentially reduce the costs, accruing interest, and finally the principal sum

on the judgment entered against Cross-defendant MINOO NEJAD REZAI in favor of KAMBAKHKH REZAI and HI-TECH DESIGN KITCHEN AND INTERIORS, a California corporation.

7. **Stipulation Between Cross-complainants KAMBAKSH REZAI, etc. and HI-TECH DESIGN KITCHEN AND INTERIOR, a California corporation and Cross-defendant MINOO NEJAD REZAI.** In the event Cross-defendant MINOO NEJAD REZAI fails to make payments to the Plaintiff UNITED STATES OF AMERICA, pursuant to paragraph 5, *supra*, and/or Plaintiff and Judgment Creditor otherwise pursues its post-judgment collection remedies to enforce or collect monies from Cross-complainants KAMBAKSH REZAI and/or HI-TECH DESIGN KITCHEN AND INTERIORS, a California corporation, said Cross-Complainants each and all may immediately seek and obtain a writ of possession and writ of execution on their verified application without further notice of hearing, and Cross-complainants may immediately take action to collect all monies then due and owing on the judgment, plus interest and costs accruing from the time of default by Cross-defendant MINOO NEJAD REZAI. Any monies collected by Cross-complainants will first reimburse Cross-complainants' monies collected by Plaintiff United States of America from said Cross-complainants plus costs and attorneys fees actually expended with the balance of monies collected to be tendered to Plaintiff United States America.

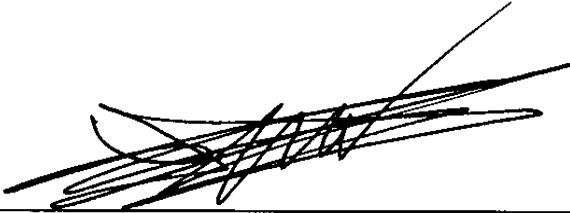
8. All payments due under this Stipulation are payable to the U.S. Department of Justice. All payments shall be sent to: U.S. Department of Justice, Central Intake Facility, P.O. Box 198558, Atlanta, GA 30384. Each co-defendant's social security number, and "CIF File Nos. C-102-01274; C-102-01275; and C-102-01276" shall be on the front of each check or money order. A copy of each payment shall be delivered by mail or by facsimile to plaintiff's lawyers GOLDSMITH & HULL.

9. Ardalan & Associates by P. Christopher Ardalan is defendants and cross-complainants HI-TECH DESIGN KITCHEN AND INTERIORS, a California corporation and KAMBAKSH REZAI aka KAMBAKHAH REZAI's counsel in this case. Halpern

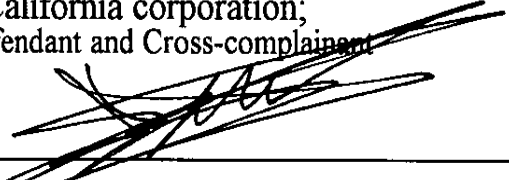
1 & Halpern by H. Russell Halpern is defendant and cross-defendant MINOO NEJAD  
 2 BAKHSH aka M.N. BAKHSH aka MINOO NEJAD REZAI's counsel in this case.  
 3 Goldsmith & Hull, P.C. by Scott M. Gitlen is Plaintiff's counsel in this case and is  
 4 authorized to execute this stipulation on behalf of Plaintiff United States of America.  
 5 Plaintiff's counsel, Defendants' counsel, Cross-complainants' counsel and Cross-defendants'  
 6 counsel, approve of the form of the Stipulation and join in it. Plaintiff, Defendants, Cross-  
 7 complainants, and Cross-defendant each voluntarily, knowingly, and intelligently waive their  
 8 respective due process rights, rights to trial, rights to notice and rights to hearing, and time  
 9 for appeal, retrial, or for entry of judgment by approving this stipulation for entry of  
 10 judgment.

11  
 12  
 13 STIPULATED AND AGREED BY:

14  
 15 DATED: 3.29.03.

  
 16 HI-TECH DESIGN KITCHEN AND INTERIORS,  
 17 a California corporation;  
 Defendant and Cross-complainant

18 DATED: 3.29.03.

  
 19 KAMBAKHS REZAI aka KAMBAKHAH REZAI  
 20 Defendant and Cross-complainant

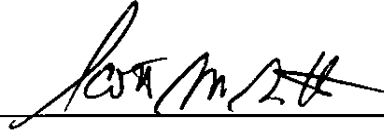
21 DATED: 3/20/2003

  
 22 MINOO NEJAD BAKHSH aka M.N. BAKHSH  
 23 aka MINOO NEJAD REZAI  
 24 Defendant and Cross-defendant

1 APPROVED AS TO FORM AND CONTENT AND SUBMITTED BY:

2  
3 DATED: 3-21-03

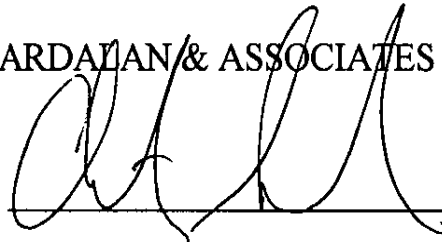
GOLDSMITH & HULL, P.C.

4  
5 

6 SCOTT M. GITLEN  
7 Attorneys for Plaintiff  
UNITED STATES OF AMERICA

8 DATED: 3/20/03

9 ARDALAN & ASSOCIATES

10  
11 

12 P. CHRISTOPHER ARDALAN  
13 Attorney for Defendants and  
14 Cross-complainants  
KAMBAKSH REZAI aka  
15 KAMBAKHAH REZAI and  
HI-TECH DESIGN KITCHEN AND  
INTERIORS

16 DATED: 3/20/03

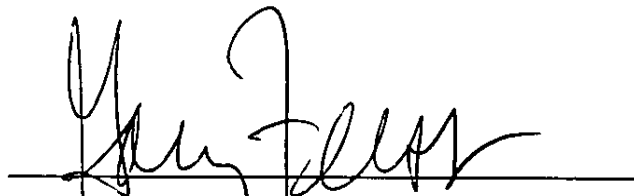
17 HALPERN & HALPERN

18  
19 

20 H. RUSSELL HALPERN  
21 Attorneys for Defendant and  
22 Cross-defendant  
MINOO NEJAD BAKHSH aka  
M.N. BAKHSH aka MINOO NEJAD REZAI

23 **CONSENT JUDGMENT ENTERED.**

24  
25  
26 DATED: 3/21/03

27  
28 

GARY ALLEN FEESS  
UNITED STATES DISTRICT JUDGE

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the county of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 18425 Burbank Boulevard, Suite 615, Tarzana, CA 91356.

On the date set forth below I served the foregoing document described as **STIPULATION FOR ENTRY OF CONSENT JUDGMENT** on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

H. Russell Halpern, Esq.  
HALPERN & HALPERN  
18663 Ventura Boulevard, Suite 200  
Tarzana, CA 91356

Attorneys for Defendant  
Minoo Nejad Bakhsh

P. Christopher Ardalan, Esq.  
ARDALAN & ASSOCIATES  
15303 Ventura Boulevard #400  
Sherman Oaks, CA 90403

Attorneys for Defendant and Cross-Complainant  
Kambaksh Rezai aka Kambakhah Rezai  
Hi-Tech Design Kitchen and Interior

☒ BY MAIL. ☐ I deposited such envelope, postage thereon fully prepaid, in the United States mail at Tarzana, California.

☒ As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Tarzana, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

☐ BY PERSONAL SERVICE. I delivered such envelope(s) by hand to the office(s) of the addressee(s).

☐ STATE. I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct

☒ FEDERAL. I declare that I am employed in the office of a member of the bar of this court at whose direction this service was made.

Executed on 3/21/03 at Tarzana, California

  
S Helms